



Eric Gonzalez
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KINGS COUNTY
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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: ANNAND NARAYAN

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED ON OR ABOUT 07/14/2009, WHILE THE MOS WAS ASSIGNED TO THE 73RD PRECINCT AND ON DUTY INSIDE OF LONG ISLAND COLLEGE HOSPITAL IN KINGS COUNTY:

1. MOS NARAYAN DID FAIL AND NEGLECT TO PROPERLY SECURE AND HANDCUFF A HOSPITALIZED PRISONER KNOWN TO THE DEPARTMENT.
2. MOS NARAYAN DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT WHEN MOS NARAYAN FAILED TO MAKE PROPER AND ACCURATE MEMOBOOK ENTRIES.
3. MOS NARAYAN DID FAIL TO PROPERLY SECURE SAID PRISONER, WHEN HE ALLOWED SAID PRISONER TO MAKE AN UNAUTHORIZED TELEPHONE CALL.

CASE STATUS: CLOSED ON 03/02/2012

PENALTY: FORFEITURE OF SIX (6) VACATION DAYS AND MOS NARAYAN REMANDED TO COMMAND FOR COMMAND DISCIPLINE "B" PENALTY.

Disclosure # 2:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

| PLAINTIFF | DOCKET | COURT | FILED | DISPOSED | DISPOSITION |
|------------------|-------------|-----------|----------|----------|---|
| Ude Ofuru Elijah | 13-CV-114 | E.D.N.Y. | 01-08-13 | 01-30-15 | Settlement, without admission of fault or liability |
| Tia Roker, | 500502/2013 | Kings Cty | 01-31-13 | | Pre-Request for |

| | | | | | |
|---------------|--|----------|--|--|---|
| Tamming Davis | | Sup. Ct. | | | Judicial Intervention, latest update 05- 05-17 Plaintiff's Notice of Intent to Continue Action |
|---------------|--|----------|--|--|---|

IN ADDITION, OUR OFFICE IS AWARE OF THE FOLLOWING CIVIL ACTIONS IN WHICH MOS NARAYAN IS A NAMED DEFENDANT:

1. TINESHACHESTER COLLIS CHESTER SHAHMAL JEROME AND RONDELL SOMERSET V. CITY OF NEW YORK, ET AL, 13667/12, FILED IN KINGS COUNTY SUPREME COURT.
2. SHAMAL JEROME V. CITY OF NEW YORK, ET AL, 7067-2012, FILED IN KINGS COUNTY SUPREME COURT.
3. ALEK KAJEWSKI V. CITY OF NEW YORK, ET AL, 101088/2014, FILED IN RICHMOND COUNTY SUPREME COURT.
4. CHARLYS LUCIANO V. CITY OF NEW YORK, ET AL, 006436/2014 FILED IN KINGS COUNTY SUPREME COURT.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County